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*Attorneys for Defendant Arnold Palacios in his Personal Capacity*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS**

Imperial Pacific International (CNMI) LLC, *et al.*,

Plaintiff,

v.

Commonwealth of the Northern Mariana  
Islands, *et al.*,

Defendants.

Case No. 24-cv-00001

**STIPULATION TO EXTEND TIME FOR  
DEFENDANTS TO FILE A  
RESPONSIVE PLEADING OR MOTION**

Hearing date: n/a  
Hearing time: n/a  
Judge: Hon. David O. Carter

Plaintiff Imperial Pacific International (CNMI) LLC, Plaintiff Best Sunshine International Ltd (BVI), Defendant Arnold Palacios, in both his official and personal capacities, and Defendant the Commonwealth of the Northern Mariana Islands (together, the “Parties”), hereby stipulate and agree, through their undersigned counsel:

1 1. On July 23, 2024, Plaintiffs filed their Second Amended Complaint. (ECF No. 56).

2 2. Under Fed. R. Civ. P. 15(a)(3), Defendants are therefore required to respond to the SAC  
3 within 14 days, thus on or before August 6, 2024.

4 3. During the period from July 23 to August 6, 2024, counsel for the above-listed Defendants  
5 was and will be occupied with other professional and personal matters planned far in advance that  
6 will make it difficult to prepare a response within this timeframe.

7 4. Accordingly, the Parties jointly request that Defendants be granted an additional seven (7)  
8 days to file their response to the SAC, thus making that response due on August 13, 2024.

9 5. Plaintiffs agree that they will not be prejudiced by such an extension of time.

10 6. This is the Parties first request for an extension of this deadline, and it will not change any  
11 other existing events or deadlines in the case.  
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14 Respectfully submitted this 31st day of July, 2024.

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16 SIGNATURES:

17 \_\_\_\_\_/s/\_\_\_\_\_  
18 Michael Chen  
19 Attorney for Plaintiff Imperial Pacific International (CNMI) LLC

20 \_\_\_\_\_/s/\_\_\_\_\_  
21 Michael Chen  
22 Attorney for Plaintiff Best Sunshine International Ltd (BVI)

23 \_\_\_\_\_/s/\_\_\_\_\_  
24 Aaron Halegua  
Attorney for Defendant Arnold Palacios, in his personal capacity

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Bruce Berline

Attorney for Defendant Arnold Palacios, in his personal capacity  
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\_\_\_\_\_/s/\_\_\_\_\_  
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Brendan Layde

Attorney for Defendant Arnold Palacios, in his official capacity  
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\_\_\_\_\_/s/\_\_\_\_\_  
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J. Robert Glass, Jr.

Attorney for Defendant Commonwealth of the Northern Mariana Islands  
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